

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: INSURANCE BROKERAGE
ANTITRUST LITIGATION

MDL No. 1663
Civil No. 04-5184 (FSH)

APPLIES TO ALL ACTIONS

IN RE: EMPLOYEE-BENEFIT INSURANCE
BROKERAGE ANTITRUST LITIGATION

Civil No. 05-1079(FSH)

APPLIES TO ALL ACTIONS

**Exhibit A
Declaration Concerning Material Covered by
Discovery Confidentiality Order**

I, the undersigned, hereby declare that I have read the attached Discovery Confidentiality Order entered in the coordinated and consolidated actions before the District of New Jersey entitled In re: Insurance Brokerage Antitrust Litigation., Civil Action No. 04-5184 and In Re: Employee Benefit Insurance Brokerage Litigation., Civil No. 05-1079. I understand the terms of this Discovery Confidentiality Order.

I will comply with all of the provisions of the Discovery Confidentiality Order. I will hold in confidence, will not disclose to anyone not qualified under the Discovery Confidentiality Order, and will use only for the purposes expressly set forth in the Discovery Confidentiality Order, any Confidential Information or Attorneys' Eyes Only Information, including the substance and any copy, summary, abstract, excerpt, index, or description of such material that is disclosed to me. I agree to submit to the personal jurisdiction of the District of New Jersey in any proceeding related to the enforcement of this Discovery Confidentiality Order, including any proceedings related to contempt of Court. At the conclusion of my involvement in this matter, I agree to return all Confidential Information or Attorneys' Eyes Only Information which comes into my possession, and all documents and things that I have prepared relating thereto, to counsel from whom I received such materials.

I declare that the foregoing is true and correct. I understand that if any of the statements made by me are willfully false, I am subject to punishment.

Name of Individual: Robert S. Schachter

Present occupation/job description: Attorney

Name of Company or Firm: Zwerling, Schachter & Zwerling, LLP

Address: 41 Madison Avenue, New York, NY 10010

Telephone No.: 212-223-3900

Relationship to this action and its parties: Counsel to Michigan Multi-King, Inc.
and Lincoln Adventures, LLC.

Dated: May 24, 2012

Robert S. Schachter
Signature